

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

IN RE: MARGARET ANN WAYNE

CASE #19-50443

Debtor

APPLICATION FOR APPROVAL OF ATTORNEY'S FEES

Cox Law Group, PLLC, ("Cox Law Group"), in its capacity as counsel for **MARGARET ANN WAYNE**, the above-captioned debtor, submits the following as its application for compensation and approval of attorneys fees pursuant to 11 U.S.C. §§ 330, 331, and 1326 and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Application"). Cox Law Group certifies that a copy of this Application has been forwarded to the Debtor. For its Application, Cox Law Group seeks approval of compensation in the amount of \$500.00, and in support thereof Cox Law Group states as follows:

1. The Debtor filed a Chapter 13 Bankruptcy on 5/23/2019.
2. The Debtor executed the attached Legal Services Agreement agreeing to a \$4,000.00 fee for work required in her case through confirmation of her Chapter 13 plan.
3. The legal services performed by Cox Law Group were necessary in an effort to assist the Debtor in seeking the confirmation of her Chapter 13 plan.
4. The legal services provided to the Debtor included but were not limited to the following:
 - A. Consultations to advise as to options in Bankruptcy
 - B. Review of documents and information provided by the Debtor
 - C. Analysis of Debtor's finances and preparation of a household budget
 - D. Development and drafting of a Chapter 13 repayment plan

- E. Preparation of Bankruptcy Petition and Schedules
- F. Drafting Motions for the valuation of cars and other personal property
- G. Filing all documents with the Court
- H. Communicating with Clerk's Office and Chapter 13 Trustee's Office
- I. Responding to inquiries of creditors, the Court and the Trustee
- J. Representation at the Meeting of Creditors and any continued hearings
- K. Coordination of the Chapter 13 Trustee's requests for additional information after the Meeting of Creditors
- L. Representation at the Confirmation Hearing and any continued hearings
- M. Resolution of objections to confirmation filed by creditors and the Trustee.

5. The Debtor's case is potentially subject to dismissal for the Debtor's failure to comply with conditions imposed in Trustee's objections to confirmation, request for documents, and motion to dismiss.

6. Debtor's counsel submits that he has provided the services required under the fee agreement with the Debtor and that were necessary for the confirmation of the Debtor's case. Said fees are reasonable and in conformance with the standard fees awarded for Chapter 13 cases.

WHEREFORE, Cox Law Group submits this Application for Approval of Attorney's Fees in the amount of \$500.00, said fee to be paid as an administrative expense through the Chapter 13 plan from the funds available, less the appropriate Trustee's fees and expenses, prior to the closing of this case, and for such other and further relief as the Court deems appropriate.

COX LAW GROUP, PLLC

/s/ David Cox

Counsel

David Cox
VSB 38670
COX LAW GROUP, PLLC
900 Lakeside Drive
Lynchburg, VA 24501
434-845-2600
Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on the **4th day of December 2019**, a true and correct copy of this pleading was served via first class mail (or electronically as otherwise permitted by local rule) to the Debtors, to the Chapter 13 Trustee, and to all creditors on the Mailing Matrix in this case.

/s/ David Cox

Counsel

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG VIRGINIA**

IN RE:

MARGARET ANN WAYNE

Debtor

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CHAPTER 13

CASE NO. 19-50443

**NOTICE OF HEARING ON
APPLICATION FOR COMPENSATION**

Please take notice that the attached APPLICATION FOR COMPENSATION filed by the Counsel for the Debtor will be heard on **JANUARY 8, 2020, at 9:30 a.m.**, in the U.S. Bankruptcy Court, 116 N. Main Street, Room 223, Harrisonburg, Virginia. Should you object or otherwise wish to be heard, please be present and prepared to protect your interests.

Date: December 4, 2019

MARGARET ANN WAYNE

By /s/ David Cox
Counsel

David Cox
COX LAW GROUP, PLLC
Counsel for Debtor
900 Lakeside Drive
Lynchburg, VA 24501
434/845-2600
434/845-0727 fax

Certificate of Service

Counsel hereby certifies that this 4th December 2019, he caused the attached notice and motion to be served by the following means: U.S. Mail to the debtor and to all creditors on the mailing matrix; and Email to the Chapter 13 Trustee.

/s/David Cox